

AUG 06 2014

CERTIFIED MAIL

RETURN RECEIPT REQUESTED

Article Number: 7013 3020 0001 1645 7291

Mr. Jim Bailey
Environmental, Health, & Safety Coordinator
TPI Iowa LLC
2300 N. 33rd Avenue East
Newton, Iowa 50208

RE: TPI Iowa LLC
Newton, Iowa
RCRA ID No.: IAR000510156

Dear Mr. Bailey:

On April 18, 2012, a representative of the U. S. Environmental Protection Agency inspected your facility. During the EPA's inspection, TPI Iowa LLC was cited for failing to comply with the following accumulation container requirements:

1. Title 40 Code Federal Regulations (40 CFR) 262.34(a)(3) - Failure to label or clearly mark a 55-gallon hazardous waste accumulation container of paint related waste from paint gun cleaning with the words "hazardous waste."
2. 40 CFR 262.34(a)(2) - Failure to clearly mark the date accumulation began on a 55-gallon hazardous waste accumulation container of paint related waste from paint gun cleaning.
3. 40 CFR 262.34(a)(1)(i) referencing 40 CFR 265.173(a) - Failure to keep a 55-gallon hazardous waste accumulation container of paint related waste from paint gun cleaning closed, except when it is necessary to add or remove waste.
4. 40 CFR 262.34(a)(1)(i) referencing 40 CFR 265.174 - Failure to conduct weekly inspection of a 55-gallon hazardous waste accumulation container of paint related waste from paint gun cleaning.
5. 40 CFR 262.34(a)(4) referencing 40 CFR 265.32(c) - Failure to have spill control equipment, fire control equipment, and decontamination equipment available near the 55-gallon hazardous waste accumulation container of paint related waste from paint gun cleaning.

In subsequent discussions, TPI stated that they had believed the container to be a satellite accumulation container and indicated that they wished to locate a hazardous waste container in a manner that it was in compliance with the satellite accumulation container requirements.

AWMD/WEMM/Bredehoft/mrw:07/30/2014:H:AWMD/WEMM/FY2014:DB:TPI Letter on Container Placement.07.30.2014.doc

WEMM	WEMM	CNSL	WEMM
Bredehoft	Snowden	Holmes	Toensing
08/5/2014	08/5/2014	08/6/2014	08/6/2014

DMB

RCRA



532288

Based on Mr. David Lloyd's June 25, 2014, e-mail as well as subsequent telephone and e-mail correspondence, the EPA understands the following information regarding the new location of the hazardous waste container:

- A photograph of the hazardous waste container was provided on June 25, 2014.
- Within the photograph, the hazardous waste container is identified.
- The June 25, 2014, photograph shows the wall of the paint booth. The door to the paint booth is immediately to the left of the box labeled "paint." The equipment is to the left of the door in the photo (next to the photographed fan). The supervisor's desk is to the right of the paint booth door.
- The hazardous waste container receives paint related waste from equipment clean out from equipment used in the photographed paint booth.
- The operators are the people assigned to the painting department. Painting is constantly occurring and there are always painters in the area.
- There are no other operations in the area and no other wastes are placed into the container.

Based on the EPA's understanding of the information provided and the requirements outlined at 40 CFR 262.34(c) (i.e., less than 55-gallons of non-acutely hazardous waste accumulated, at or near the point of generation where waste initially accumulates, and under the control of the operator of the process generating the waste), it appears that this container meets the satellite accumulation container requirements.

However, if the container is not managed as outlined above, the EPA reserves the right to review the management of the container.

Please direct all questions concerning this letter to Ms. Deborah Bredehoft, of my staff, at (913) 551-7164.

Sincerely,

Donald Toensing, Chief
Waste Enforcement and Materials Management Branch
Air and Waste Management Division

cc: Mr. Cal Lundberg, Chief, Contaminated Sites Section
Iowa Department of Natural Resources

Mr. Dave Lloyd
TPI Iowa LLC



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 7

11201 Renner Boulevard
Lenexa, Kansas 66219

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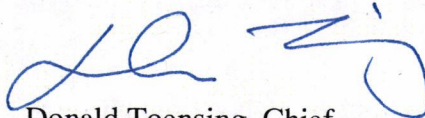
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Donald Toensing, Chief
Waste Enforcement and Materials Management Branch
Air and Waste Management Division

cc: Mr. Cal Lundberg, Chief, Contaminated Sites Section
Iowa Department of Natural Resources

Mr. Dave Lloyd
TPI Iowa LLC

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Mr. Jim Bailey
Environmental, Health & Safety Coordinator
TPI Iowa LLC
2300 N. 33rd Avenue East
Newton, IA 50208

2. Article Number
(Transfer from service label)

7013 3020 0001 1645 7291

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X

Helen Thorpe☒ Agent☐ Addressee

B. Received by (Printed Name)

Helen Thorpe

C. Date of Delivery

8/11/14

D. Is delivery address different from item 1?

☐ Yes

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3. Service Type

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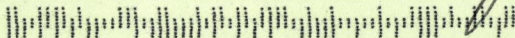
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USPS
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- Sender: Please print your name, address and ZIP+4® in this box.

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Region 7
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WEMM

Attn: Deborah Bredheft



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Environmental, Health & Safety Coordinator

TPI Iowa LLC

2300 N. 33rd Avenue East

Newton, IA 50208

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